

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

STEVEN RAMSEY

Plaintiff,

v.

JAY CASHMAN, INC.

Defendant

Defendants.

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CIVIL ACTION

NO. 04-CV-10699(RCL)

**JOINT MOTION TO ADJOURN PRE-TRIAL CONFERENCE AND REOPEN
DISCOVERY AND EXPERT DISCLOSURES**

NOW COME the parties in the above-entitled matter and respectfully request this Honorable Court to adjourn the pre-trial conference and reopen discovery and deadlines for expert disclosures for the following reasons:

1. This is a Jones Act case alleging back and neck injuries as a result of an accident on April 5, 2001.

2. On September 15, 2005, the Court issued an order which, inter alia, established a discovery deadline of November 21, 2005 and deadline for expert disclosures of November 11, 2005.

3. On August 21, 2006 the court entered an Order scheduling a final pre-trial conference for October 26, 2006.

4. On October 5, 2006, plaintiff underwent lumbar disc surgery at Cape Cod Hospital. A copy of the Cape Cod Hospital Clinical Resume is attached hereto as Exhibit "A".

5. In light of this significant medical development, additional time will be needed by the parties to accommodate plaintiff's medical recuperation and to conduct further necessary

discovery and expert evaluations.

6. Based on the foregoing, the parties respectfully request that the pre-trial conference be adjourned, and that a status conference be scheduled to set deadlines as to additional discovery and expert disclosures.

WHEREFORE, the parties hereby request that the October 26, 2006 Pre-Trial Conference be adjourned and the court schedule a status conference in ninety (90) days to establish new discovery and expert disclosure deadlines.

The plaintiff,
Steven Ramsey
By his attorney,

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